

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

1 MIN LLC; HOTEL AT SOUTHPORT LLC; and TWELFTH FLOOR, LLC,

## Debtors.

## Chapter 11

Case No. 24-01519 (JOINTLY  
ADMINISTERED)

**APPLICATION FOR LEAVE TO  
APPEAR PRO HAC VICE  
(MATTHEW J. LIVINGSTON)**

Pursuant to Local Bankruptcy Rule 9010-1(a)(3) and Local Rule 83.2 of the United States District Court for the Eastern District of Washington, Jeremy E. Roller of the Arete Law Group PLLC, a member in good standing of the Washington State Bar and of the United States District Court for the Eastern District of Washington, hereby moves on behalf of the EB-5 Creditors listed in the *Notice of Appearance of Jeremy E. Roller*, Dkt. No. 47, for the admission *pro hac vice* of MATTHEW J. LIVINGSTON (“Applying Counsel”) in the above captioned case based on the following:

1. Applying Counsel's business address, phone number, and email are as follows:

Reid & Wise LLC  
One Penn Plaza, Suite 2015  
New York, NY 10119  
(212) 858-9982  
[mlivingston@reidwise.com](mailto:mlivingston@reidwise.com)

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ARÊTE LAW GROUP

600 University St. Suite 2420

University St, Suite  
Seattle WA 98101

Seattle, WA 98101  
- 0: (206) 428-3250

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1           2. Applying Counsel is admitted to practice law in the following states:

2           New York – Admitted September 12, 2016, Attorney No. 5456710

3           3. Applying Counsel is admitted to practice law in the following courts:

4           United States District Court for the Eastern District of New York  
5           United States District Court for the Southern District of New York

6           4. Name, address, phone number, and email of admitted counsel with whom the  
7           applicable will be associated (“Local Counsel”) are as follows:

8           Jeremy E. Roller, WSBA No. 32021  
9           Arete Law Group PLLC  
10           600 University Street, Suite 2420  
11           Seattle, WA 98101  
12           (206) 428-3250  
13           jroller@aretelaw.com

14           5. Necessity of Appearance: Applying Counsel requests permission to appear *pro*  
15           *hac vice* as Applying Counsel and his firm have represented the EB-5 Creditors, plaintiffs  
16           with active litigation against all three debtors in the above-captioned jointly administered  
17           cases. Applying Counsel’s experience with the EB-5 Creditors and litigation claims  
18           combined with his Chapter 11 experience representing both debtors and creditors will facilitate  
19           an efficient representation of the EB-5 Creditors herein.

20           6. Applying Counsel is not currently subject to any pending disciplinary  
21           sanctions nor has he ever been subject to any disciplinary sanctions by any court or bar  
22           association.

23           7. Applying Counsel has read and is familiar with the Local District Court Rules,  
24           particularly Local District Court Rule 83.2(c), and understands it is necessary for Local  
25           Counsel to sign all pleadings, motions, and other papers prior to filing and service and Local  
26           Counsel shall have meaningful participation in the case.

27           8. Pursuant to Local Bankruptcy Court Rule 9010-1(a)(3) and Local District  
28           Court Rule 83.2(c)(2), the required fee has been paid.

1                   WHEREFORE Applying Counsel, Matthew J. Livingston, requests this Court enter  
2 an order admitting him to practice law before this Court in this case and any related cases,  
3 adversary proceedings, and appeals, and to serve as co-counsel with Jeremy E. Roller.

4  
5                   DATED: October 1, 2024  
6

7                   **REID & WISE LLC**

8                   By: /s/ Matthew J. Livingston  
9                   Matthew J. Livingston  
10                  One Penn Plaza, Suite 2015  
11                  New York, NY 10119  
12                  Phone: (212) 858-9982  
13                  mlivingston@reidwise.com

14  
15                  *Applying Counsel, Attorney for EB-5*  
16                  *Creditors*

17                   **ARETE LAW GROUP PLLC**

18                   By: /s/ Jeremy E. Roller  
19                   Jeremy E. Roller, WSBA No. 32021  
20                  600 University Street, Suite 2420  
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25  
26                  *Local Counsel, Attorney for EB-5*  
27                  *Creditors*

